



JAMES E. JOHNSON  
Corporation Counsel

THE CITY OF NEW YORK  
**LAW DEPARTMENT**  
100 CHURCH STREET  
NEW YORK, NY 10007

JAMES R. MURRAY  
Assistant Corporation Counsel  
Phone: (212) 356-2372  
Fax: (212) 356-3509  
jamurray@law.nyc.gov

June 26, 2020

**VIA ECF**

Honorable Cheryl L. Pollak  
United States Magistrate Judge  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: Palmer, *et al.* v. City of New York, *et al.*, 19 CV 5542 (RPK) (CLP)

Your Honor:

I am an Assistant Corporation Counsel in the Office of James E. Johnson, attorney for Defendants City of New York, Inspector Elliot Colon, and Police Officer Ramos (hereinafter “City Defendants”) in the above-referenced matter. The undersigned respectfully writes to respond to the Court’s January 31, 2020 Order.

By way of background, Plaintiffs filed the instant 42 U.S.C. § 1983 action on October 1, 2019, alleging, *inter alia*, that Defendants E 40 Buyers IG, LLC, Samuel Weintraub, and Frank Singh conspired with Defendant members of the New York City Police Department (hereinafter “NYPD”) to have Plaintiffs removed from their home and to have Plaintiff Kingsley Palmer falsely arrested on June 27, 2019. ECF No. 1. By Order dated January 31, 2020, the Court directed Corporation Counsel to provide the full names, shield numbers, and service addresses of all defendant police officers by April 8, 2020. On March 26, 2020, Defendant City requested an extension of its time to respond to the Court’s January 31, 2020 Order, and to answer. ECF No. 19. On March 27, 2020, the Court extended City Defendants’ time to answer and respond to its January 31, 2020 order until June 26, 2020.

The undersigned now writes to provide the Court with the names, shield numbers, and service addresses of the following officers who interacted with Plaintiff Kingsley Palmer during his June 27, 2019 arrest. As Plaintiffs’ Complaint does not levy specific allegations against the “John Doe” officers, the undersigned does not know who they intend to sue. Listed below are the names of the officers on scene who, upon the undersigned’s information and belief, interacted with Plaintiffs on the date of incident. City Defendants are still attempting to determine the identities of any further officers present on scene.

- 1) Police Officer Adam Giacalone, Shield No. 13860  
67<sup>th</sup> Precinct of the NYPD  
2820 Snyder Avenue  
Brooklyn New York, 11226
- 2) Police Officer Nicholas Cardieri, Shield No. 11420  
67<sup>th</sup> Precinct of the NYPD  
2820 Snyder Avenue  
Brooklyn New York, 11226

Respectfully submitted,

James R. Murray s/  
James R. Murray  
Assistant Corporation Counsel  
New York City Law Department  
100 Church Street, Room 3-183  
New York, New York 10007  
(212) 356-2372  
jamurray@law.nyc.gov

CC: Karamvir Dahiya, Esq. (By ECF)  
*Attorney for Plaintiffs*

Rachel Aghassi, Esq. (By ECF)  
*Attorney for Defendant Stephen Weintraub*